UNITED STATES

ENVIRONMENTAL PROTECTION AGENCY

REGION III

STATEMENT OF BASIS

LORD CORPORATION
CAMBRIDGE SPRINGS, PENNSYLVANIA 16403

EPA ID NO. PAD051129757

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I. Introduction

The United States Environmental Protection Agency ("EPA") is issuing this Statement of Basis ("SB") to solicit public comment on EPA's determination that Lord Corporation, Cambridge Springs Mechanical Plant ("Lord" or "Site" or "Facility") located at 124 Grant Street, Cambridge Springs, Crawford County, Pennsylvania 16403-0246 has attained Corrective Action Complete with Controls. The Facility is subject to the requirement of performing corrective action activities because it is subject to the provisions of Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976 ("RCRA") and the Hazardous and Solid Waste Amendment of 1984 ("HSWA"), 42 U.S.C. §§ 6901 - 6992. This law requires facilities such as Lord to investigate and clean up releases of hazardous wastes or hazardous constituents that have occurred at their facility. This SB explains EPA's preliminary determination that Lord has fully investigated and properly cleaned up the Facility pursuant to the authority of the Commonwealth of Pennsylvania's Land Recycling and Environmental Remediation Standards Act ("Act 2"). The Pennsylvania Department of Environmental Protection (PADEP) approved Lord's Final Report in May 2003.

PADEP's approval of Lord's post remedial plan activities required Lord to prohibit the use of groundwater for potable purposes through a deed restriction and to include a deed notice of contamination at the site. EPA's proposal to designate the Facility as "Corrective Action Complete with Controls" is consistent with PADEP earlier approval and current EPA guidance entitled "Final Guidance on Completion of Corrective Action at RCRA Facilities (February 25, 2003)."

II. Facility Background

The Lord Mechanical facility is located in the northwest sector of Cambridge Springs, a small town of around 2,000 people in Crawford County. The facility is located on approximately 16.6 acres just west of Grant Street and south of French Creek. The site contains a 149,000 square foot manufacturing building. To the north lays the Cambridge Springs Wastewater Treatment Plant and French Creek (within 200 feet). The area to the east of the plant is light industrial and residential. To the west lays Jackson Run (a tributary located within 100 feet of the site) and undeveloped land. This site lies within the French Creek flood plain. Attachment 1 shows the site location. Attachment 2 presents the layout of the Facility.

Most of the property is covered with building or impermeable surfaces such as asphalt or macadam parking lots and driveways. The property is enclosed with a chain-link fence with limited access. A water storage tower and pump house for fire protection are located on the northwest corner of the facility property.

The Lord Corporation acquired the Cambridge Springs property from White Industries, Inc. in 1966. While the nature of facility operation prior to 1966 is unknown, White Industries operated a small manufacturing facility here. Since 1966, Lord Corporation has performed rubber

to metal bonding operations on the property. These operations expanded considerably during the 1970's when Lord constructed a large addition to the original structure. Lord began machining metal components here in 1974 This facility was known as the Lord Kinematics facility until 1983 when it was redesignated as the Lord Mechanical Products facility.

The Lord Mechanical Products facility manufacturers elastomer-to-metal-bonded (rubber to metal) products. The metals include steel, stainless steel, aluminum, and brass. The elastomers include natural rubber, styrene butadiene elastomer, chlorobutyl elastomer, neoprone, nitrile elastomer, epichlorohydrine elastomer, ethylene propylene diene turpolymers, and polyvinyl chlorides. None of the elastomers are manufactured at the facility. Metals are prepared for bonding by machining, degreasing, grit blasting, chemical treatment, and adhesive application. Elastomer preparation consists of milling, extruding, strip forming, and dicing. The blending process is accomplished by press curing the uncured elastomer and adhesive to the metal. Finishing processes consist of deflashing, coating, painting, and packaging . Typically, the adhesives used contain high percentages of methyl isobutyl ketone, xylene, methyl ethyl ketone, and tetrachloroethylene before use.

Geology beneath the Facility consists mainly of silt and clay fill and disturbed deposits to approximately 3 feet below land surface (ft bls). These deposits overlie interbededded clay, silt, silty sand and silt and gravel to 7 to 9 ft bls. This heterogeneous layering of permeable and less permeable materials extends below the water table in some areas of the Facility, including within the source area adjacent to the main manufacturing building. The finer grained deposits are underlain by sand and gravel which is uniformly distributed beneath the investigation area to depths of 12 to 17 ft bls at which depth the surface of a very stiff, plastic gray clay was encountered. The dense clay unit is laterally continuous beneath the Facility. The surface topography of the clay units varies from 15 to 18.5 ft bls. Based on a Pennsylvania Department of Transportation (PADOT) boring installed adjacent to the site as part of the Grant Street Bridge project, this clay unit is 44 feet thick, and overlays a layer of sandstone on top of siltstone.

Groundwater was determined to be present in the unconsolidated silt, sand and gravel deposits which overlie the clay unit. Depth to groundwater ranged from approximately 7 ft bls at the south Facility fence line to approximately 11 to 12 ft bls along the north fence line. Analysis of groundwater elevation data indicated a groundwater flow direction north-northeast toward French Creek.

III. Summary of the Environmental Investigations and Activities

In 1994, EPA completed a RCRA Facility Assessment/Environmental Priorities Initiative (RFA/EPI) and subsequent RFA/EPI Report. Lord initiated an Initial Characterization Investigation (completed July 30, 1997 through August 2, 1997) to evaluate Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) identified by EPA.

The results of the Initial Characterization Investigation indicated that no significant impacts to environmental media were present at the SWMUs and AOCs. However, tetrachloroethene (PCE) was detected in groundwater along the north boundary fence. Based on this finding, Lord initiated remedial investigation efforts in the area north of the manufacturing building, which has been defined as an Act 2 "Site." Lord Corporation believed that the PCE contamination was likely attributable to small spills and leaks that occurred around the PCE unloading area. No specific sources or events had been identified.

In August 1998, Lord submitted Notice of Intent to Remediate (NIR) to PADEP, notified Borough of Cambridge Springs and posted a notice in the Erie Times.

In November 1998, Lord submitted a Site Remedial Investigation/Risk Assessment (RI/RA) to PADEP. The RI/RA identified a shallow band of contaminated groundwater originating along the northern facility boundary. This groundwater discharges to French Creek and consists of volatile organic compounds.

In February 1999, PADEP approved the overall Site Remedial Investigation/Risk Assessment. PADEP required Lord to monitor the plume since conclusions regarding the amount of contamination reaching French Creek were based on plume dimensions and rate of movement. PADEP also requested that Lord amend the property deed to both restrict groundwater use and to include a notice of contamination at the facility.

In December 2000, Lord submitted to EPA a technical study on Remedial Technology Screening. In this report, Lord concluded that active remediation was not necessary since existing concentration of Volatile Organic Compounds did not pose a risk to human health or French Creek. Lord proposed that institutional controls be implemented and enforced so that potential risks posed by the facility were managed.

Property deed restrictions were drafted for the Facility in 2001 and submitted to the Erie County Recorder of Deeds office. The deed changes were officially recorded on March 12, 2001.

In March 2002, Lord submitted to PADEP an Act 2 Final Report which concluded that the levels of chlorinated volatile organic compounds (CVOCs) at the Facility meet site specific standards under Act 2 and requested relief from liability. The Final Report specifically concluded that the levels of CVOCs in the groundwater discharging from the Facility to French Creek, comprised of a diffuse plume and seeps, met applicable human health criteria limits under Act 2. The conclusion was based on the fate and transport analysis and surface water dilution calculations performed by Lord pursuant to 1997 Act 2 Technical Guidance Manual, which was in effect at the time of the submission of the Final Report.

In June 2002, PADEP disapproved the Final Report on the basis that its calculation of the in-stream concentration of PCE from the diffuse groundwater discharge at the Facility using the

newly-adopted PENTOXSD model showed that human health criteria limits under Act 2 would be exceeded.

In July 2002, Lord filed an appeal of PADEP's June 2002 disapproval.

In November 2002, Lord submitted to PADEP a Draft Phytoremediation Work Plan proposing additional remediation measures on the Facility designed to minimize the potential impact of CVOCs in the groundwater at the Facility. The Work Plan was proposed to settle the appeal filed by Lord of the decision by the PADEP to deny Lord's Act 2 Final Report of 2002 submitted under Act 2.

In April 2003, Lord submitted to PADEP a Final Phytoremediation Work Plan. The Work Plan outlined the design criteria considered to construct the phyto-barrier that would intercept groundwater flowing into French Creek.

In May 2003, Lord Corporation and PADEP entered into a Consent Order and Agreement with respect to Act 2 activities associated with the Facility.

By letter dated May 14, 2003, PADEP withdrew its June 2002 disapproval of the Lord Final Report dated March 26, 2002 ("Final Report"). In the May letter, PADEP approved the Final Report submitted on behalf of Lord pursuant to Act 2 and indicated the Facility attained a site specific standard. In addition, PADEP required a deed notice.

In February 2007, Lord submitted PADEP a Summary Report for 2006 Activities in accordance with the 2003 Final Phytoremediation Work Plan. Lord indicated that the 2006 Summary Report would be the final report submitted to PADEP. Collection of groundwater elevation data had been discontinued and there was no projected monitoring or reporting in 2007 or thereafter. The phytoremediation barrier would continue to be maintained with periodic trimmings and tree replacement as necessary.

IV. Investigation Results

From July 1997 to October 2006, Lord conducted investigative and remedial actions to fulfil the site characterization requirements of Act 2.

Initial Characterization Investigation

Evaluation of soil analytical data collected during the SWMU and AOC Characterization investigation indicated that all detected constituents in soil in the vicinity of the SWMUs and AOCs were present at concentrations below their respective Act 2 screening levels. Analytical results of groundwater from a temporary piezometer TPZ-3 indicated that concentration of one compound, tetrachloroethene (PCE) was detected at a concentration slightly greater than the Act 2 Used-Aquifer MSC (medium-specific concentration) but below the Non-Used Aquifer MSC.

Groundwater results from TPZ-4 indicated that the concentration of one compound, PCE, was detected at a concentration greater than the Used-Aquifer MSC and the Non-Used Aquifer. TPZ-4 was located along the north boundary fence. This area was subsequently designated a "Site" under Act 2. PCE usage at the Facility was discontinued in 1995. The investigation also revealed that no exceedances of Act 2 Statewide Health MSCs were identified at any of the SWMUs and AOCs.

Remedial Investigation

The "Site" Remedial Investigation, completed from October 1997 to October 2006, included activities such as soil borings, installation of monitor wells, multiple rounds of groundwater sampling and aquifer testing. The investigation work also consisted of Addendum 1 and 2 investigations, an assessment of fate and transport and a site-specific risk characterization, "Site" follow-up activities from 1999 to 2000 and phytoremediation activities during 2003 to 2006.

Addendum 1 investigation confirmed the presence of Volatile Organic Compounds (VOCs), primary PCE, in soil and groundwater north of the main building at the "Site." Detected concentrations of PCE in soil ranged from 0.002 milligrams per kilogram (mg/kg) to 0.6 mg/kg. Only one sample at 8 – 10 ft bls (0.6 mg/kg) exceeded Act 2 Statewide Health MSCs screening criteria for PCE 0.43 mg/kg. Concentration of PCE in the "Site" groundwater ranged from 0.027 milligrams per liter (mg/L) to 45 mg/L. Concentrations of PCE were higher than Act 2 MSCs of 0.005 mg/L.

Addendum 2 investigation confirmed the presence of PCE above the Act 2 MSCs. It (a) provided additional information such as hydraulic data and migration on the presence of VOCs in groundwater, (b) determined no separate phase PCE was observable in "Site" monitor wells, and (c) showed that active remediation through pumping would not be effective in achieving Act 2 Statewide Health MSCs for groundwater based on the results of the Source Reduction Pilot Test.

Using the highest detected concentration of PCE in groundwater at the Facility fence line, the fate and transport calculations predicted the concentration of PCE in groundwater discharging to French Creek to be 7.68 mg/L. (The calculation included the following assumptions: 1. uniform PCE concentration throughout the saturated aquifer; 2. 100 foot wide, high PCE concentration – 8.0 mg/L, center plume for diffuse discharge calculations; 3. 100 foot wide plume fringes for diffuse discharge calculations; and 4. 1,200 square feet total cross-sectional diffuse groundwater flow area to French Creek.) The in-stream surface water concentrations were determined based on Act 2 Guidance using dilution calculation to be 0.00037 mg/L which was below the Pennsylvania Title 25 Chapter 16 Water Quality Criteria for Toxic Substances permissible water quality concentration of 0.0007 mg/L for PCE under human health criteria.

Lord sampled two seeps discovered on the bank of French Creek during an inspection in June, 1998. Seep samples were submitted for laboratory analysis of VOCs using EPA Method 8260. Data indicated that the concentration of total VOCs in Seep 1 was 0.486 mg/L (consisting

of PCE and its degradation products) and total VOCs in Seep 2 was 8.2 mg/L (all PCE). These data correlated closely to the diffuse concentration predicted by the fate and transport analysis of approximately 7.68 mg/L. Additionally, the concentration of 8.2 mg/L of PCE was applied to the surface water dilution calculations and resulted in a total cumulative concentration of 0.000396 mg/L in French Creek. This value was below the indicated 0.0007 mg/L criteria.

Using exiting groundwater data and the results of a focused investigation conducted in 1997, the dimensions of the saturated zone associated with the VOC groundwater plume entering French Creek was conservatively determined to be 6 feet thick and 300 feet wide.

Facility Risk Assessment

The Facility risk assessment identified three potential human receptors: (1) a future construction worker (excavation); (2) facility workers (indoor air vapors exposure); and (3) an adolescent trespasser (groundwater seep exposure). Terrestrial and aquatic biota in French Creek were identified as potential receptors for Ecological Assessment. From a human health perspective, the evaluation of non-carcinogenic effects resulted in no Hazard Index thresholds greater than 1 for any of the potential receptors. Further, the evaluation of carcinogenic effects resulted in no Excess Lifetime Cancer Risks (ELCR) exceeding the Act 2 target ELCR of 1 x 10-5 for any receptor.

The qualitative ecological assessment indicated that the "Site" should not pose a risk to either terrestrial or aquatic life or in the vicinity of the "Site." This was based on (1) no evidence was found of the occurrence of species of concern in the French Creek area around Lord's Cambridge Springs facility according to a review of Pennsylvania Natural Diversity Inventory and (2) a qualitative ecological site reconnaissance survey confirmed that no significant adverse impact on the wetlands were evident.

"Site" Follow-up Activities

Lord performed the below follow-up activities during 1999 to 2001 as a result of receipt of PADEP approval letter of February 1999 (see Section III above).

Addendum 3 of the "Site" Remedial Investigation was to verify the VOC plume cross-sectional area, field investigation activities included depth to water measurements from existing monitoring points in the vicinity of the "Site" and a direct-push investigation along French Creek. A series of 11 geoprobe soils borings, designated GP-1 through GP-11, were performed in a line parallel to and less than 50 feet south of the southern bank of French Creek. The highest VOC concentrations detected were identified between points GP-4 and GP-9 and ranged from 0.627 mg/L (GP-4) to 9.275 mg/L (GP-5). These values dropped dramatically moving out towards either end of the sampling transect. Total VOC concentrations consisted mostly of PCE, with relatively minor concentrations of trichloroethene, trans-1,2-dichloroethene, cis-1,2-dichloroethene, and 1,1,1-trichloroethane. Vinyl chloride was not detected in groundwater

collected during the direct-push investigation. Based upon Addendum 3 investigations, the dimensions of the saturated plume associated with the VOC groundwater plume entering French Creek were re-confirmed at 6 feet high by 300 feet wide (See Section Remedial Investigation above).

Fate and transport analysis and surface water dilution calculations were completed for all VOCs found in groundwater at the "Site." Average site-specific VOC concentrations for the diffuse plume discharging to French Creek were calculated using detected concentrations from Addendum 3 direct-push investigation and quarterly sampling events when necessary. Based on the proximity of this focused investigation to the creek, and the uniform distribution of VOC concentrations across the plume front, the data adequately represented groundwater which entered French Creek.

The stream concentrations predicted using mass loading calculations were compared with Pennsylvania Title 25 Chapter 16 Water Quality Criteria for Toxic Substances (1997) for each average VOC concentration from the 1999 field investigation and monitoring data. Calculated in-stream concentrations for all detected VOCs in groundwater which may discharge to French Creek were below the human health criteria standards.

Lord conducted a review of threatened and endangered species surveys and a qualitative ecological site reconnaissance survey. Lord concluded that no evidence was found of the occurrence of species of concern in the French Creek area around the Facility and no significant adverse impacts on the wetlands were evident.

Lord conducted a review of available screening benchmarks for assessing potential ecological risks due to selected VOCs in aquatic systems. The selected VOCs included PCE, 1,1,1-trichloroethane, trichloroethene, cis-1,2-dichloroethene, trans-1,2-dichloroethene, and vinyl chloride. The review focused on the potential for direct toxicity to fish and invertebrates. Surface water screening benchmarks and sediment considerations that were applicable to the "Site" were identified and compared to chemical concentrations that had been measured or predicted in environmental media at the "Site." These comparisons showed that the discharge of VOCs in groundwater to surface water at the "Site" was not anticipated to pose a risk to the environment. The levels of VOCs in groundwater and seeps at the "Site" were similar to or lower than all applicable surface water benchmarks with the exception of measured concentrations of PCE in groundwater. However the anticipated dilution and volatilization of PCE upon contact of the groundwater and surface water would effectively reduce the contact concentration of PCE in surface water to a modeled and surface water dilution calculated concentration below surface water quality screening benchmarks.

Lord obtained a report prepared by EnvironScience of Ohio dated July 12, 2000 entitled Threatened & Endangered Fish Survey Final Report, French Creek, Crawford County, Pennsylvania, Grand Avenue Bridge. The report indicated that the viability of fish communities in the portions of French Creek that were adjacent to, and downstream of, the Facility were as good

as, or better than, the viability of communities in portions of the creek that were upstream of the Facility. Lord suggested that groundwater and surface water from the Facility pose no current or future risk to French Creek's fish or aquatic invertebrate communities.

Lord conducted one year of quarterly groundwater sampling analysis in 1999 and two years of semi-annual groundwater sampling and analysis in 2000 and 2001.

Lord prepared and submitted annual status reports in 1999, 2000 and 2001.

Lord concluded that based on data collected during the three years (1999, 2000 and 2001) of site monitoring, concentrations of VOCs did not pose a risk to human health or the surrounding ecological environment.

Phytoremediation

Phytoremediation is the use of plants and plant processes to reduce groundwater flow and mass loading to French Creek. It captures groundwater and soil pore-space water by using trees with deep root systems that take up large quantities of water. The water uptake of certain plants can be significant enough to suppress the water table, and in some instances, create zones of captured contaminated groundwater.

According to the Phytoremediation Work Plan of April 2003 (see Section III above), considering (1) the parameters developed and measured during the Act 2 investigation, the groundwater flow rate to the French Creek was approximately 31,000 gals/day and (2) the pumping rate of 200 gallons per day per tree, it was estimated the 135 hybrid poplars trees phyto-barrier would be able to remove approximately 28,000 gallons per day. The phyto-barrier could therefore bring about an approximately 90 percent reduction in the groundwater flow during the growing season after trees had matured. Lord completed the phyto-barrier (phytoremediation barrier) construction in May 2003 and implemented water level monitoring from 2003 to 2006. Water level measurements were collected from piezometers at the site on a quarterly basis. Table 1 provides historic water level data May 2003 to October 2006. The water elevation data provided indication that the system had the ability to reduce water table at the "Site." Based on the work plan, collection of groundwater elevation was discontinued and there would be no projected monitoring and reporting. The phyto-barrier will continue to be maintained with periodic trimmings and tree replacement as necessary.

V. Property Deed Restriction

Amending the Facility property deed to include a notice of contamination and to restrict groundwater use was initiated in 1999. Deed changes were completed in 2001 and submitted to the Erie County Recorder of Deeds office. The deed changes were officially recorded on March 12, 2001.

VI. Environmental Indicators

EPA has established two environmental indicators that are designated to measure the human health and groundwater impacts of RCRA facilities. These two indicators use environmental data and apply a decision matrix to determine that human health impacts are "under control" and that groundwater contamination is "under control". Lord met these indicators at the Facility in September 28, 2000. EPA believes that these environmental indicators provide additional evidence that the action proposed has been effective and will protect human health and the groundwater at the Facility in the long-term.

VII. Financial Assurance

EPA has evaluated whether financial assurance for corrective action is necessary to implement EPA's proposed remedy at the Facility. Given that EPA's proposed remedy does not require any further actions to remediate soil, groundwater contamination at this time and given that the costs of implementing institutional controls at the Facility will be de minimis, EPA is proposing that no financial assurance be required.

VIII. Evaluation of Criteria

This section provides a description of the criteria EPA uses to evaluate proposed final remedies under the Corrective Action Program. The criteria are applied in two phases. In the first phase, EPA evaluates three remedy threshold criteria as general goals. In the second phase, for those remedies which meet the threshold criteria, EPA then evaluates seven balancing criteria to determine which proposed remedy alternative provides the best relative combination of attributes.

A. Threshold Criteria

EPA's evaluation of the threshold criteria follows:

1. Protect human health and the environment

Lord obtained an Act 2 Release of Liability from PADEP for the Site. The level of CVOCs in surface and subsurface soil, groundwater and surface water at the Facility did not present a risk to human health or the environment based on information obtained during the Remedial Investigations performed by Lord. The Remedial Investigations contained a risk characterization and ecological assessment. (See Section IV. *Initial Characterization Investigation*, *Remedial Investigation* and *Facility Risk Assessment* above for screening levels.)

The only possible exposure route to contaminated groundwater or soil at the Facility is to workers taking environmental samples or to workers excavating soil in the vicinity of the Site. However, Lord is in compliance with applicable regulations governing worker safety and has developed Health and Safety Plans which provide for appropriate worker training and explains the

circumstances under which it is necessary for workers to wear protective clothing if exposure to contaminated soil and groundwater is expected.

2. Achieve media cleanup objectives

PADEP approved the Final Report submitted on behalf of Lord pursuant to Act 2 and indicated the Facility attained a site specific standard for groundwater as developed for the site using Act 2 guidance. (See Section IV. *Remedial Investigation* and *"Site" Follow-up Activities* for screening levels.)

Evaluation of soil analytical data collected during the SWMU and AOC Characterization investigation indicated that all detected constituents in soil in the vicinity of the SWMUs and AOCs are present at concentrations below their respective Act 2 screening levels. The investigation also revealed that no exceedances of Act 2 Statewide Health MSCs were identified at any of the SWMUs and AOCs.

3. Control the source(s)

Lord uses the former perchloroethylene storage tank for holding recycled water. This tank was cleaned and converted to its current use at some time after the degreasing units were taken out of service in1995. Lord implemented a phytoremediation barrier to reduce groundwater flow to French Creek. It captures groundwater and soil pore-space water by using trees with deep root systems that take up large quantities of water. The water uptake of certain plants can be significant enough to suppress the water table, and in some instances, create zones of captured contaminated groundwater. To further limit the potential for a complete exposure pathway, Lord has filed a deed notice which provides notice that the use of the site property is limited to non-residential use.

B. Balancing Criteria

Because of control activities have already been implemented and are operating and because EPA is satisfied that the control activities are protective of human health and the environment, EPA is not choosing among alternative of remedies/corrective action activities. Therefore, an evaluation of other alternatives is not necessary. Nonetheless, EPA presents the seven criteria below to illustrate the suitability of the control activities:

1. Long-Term Reliability and Effectiveness

The Facility's Act 2 investigations and remediation activities have addressed soil and groundwater contamination at the Site. EPA also considers the restrictions on groundwater use and the restrictions on the use of property to non-residential use as long term components of control activities. Lord has filed a deed notice to the Facility which provides notice that development of on-site groundwater for drinking and other domestic uses is prohibited and the

Facility property is limited to non-residential use.

2. Reduction of Toxicity, Mobility, or Volume of Wastes

Direct contact exposure pathways do not exist due to the presence of asphalt paved surface. This has eliminated the potential for the direct contact exposure and reduced the mobility of the contaminants as well. In addition, Lord implements a phytoremediation barrier to reduce groundwater flow and mass loading to French Creek.

3. Short-Term Effectiveness

Continued implementation of the phytoremediation barrier at the Facility is effective in short term since it is an activity that is currently ongoing and its continuation can be accomplished easily.

4. Implementability

The deed notice is both technically and administratively feasible. Deed notice has been filed in the Office of the Recorder of Deeds for Erie County.

5. Cost

Lord has already expended the capital costs involved in performing the investigations and remedial activities necessary to obtain a Release of Liability pursuant to PADEP's Act 2 program.

6. Community Acceptance

The local community of Cambridge Springs, Pennsylvania, was given the opportunity to evaluate all of the Facility's proposed remedial plans from the earliest stages of the investigations through conclusion of the cleanup and it has accepted Lord's corrective action and control activities. EPA will provide public notice and an opportunity for comment to any interested parties before this proposed decision becomes final.

7. State Acceptance

All of Lord's Remedial Investigation Workplans for the Facility were evaluated and approved by PADEP. PADEP issued letter approving Lord's Act 2 Final Report and granting Lord an Act 2 Release of Liability on May 14, 2003. EPA's proposed determination that the Lord Facility is Corrective Action Complete with Controls is based upon the activities performed by Lord pursuant to PADEP's Act 2.

IX. Public Participation

EPA is requesting comments from the public on its determination that the Facility is Corrective Action Complete with Controls. On January 30, 2008, EPA placed an announcement in the local newspaper, The Meadville Tribune, to notify the public of the availability of this Statement of Basis, its supporting Administrative Record, and the public's opportunity to request a public meeting on EPA's proposed corrective action for the Facility. The public comment period will last thirty (30) calendar days from the date that this matter is publicly noticed in a local paper. Comments should be sent to EPA in writing to the address listed below, and all cementers will receive a copy of the final decision and a copy of the response to comments.

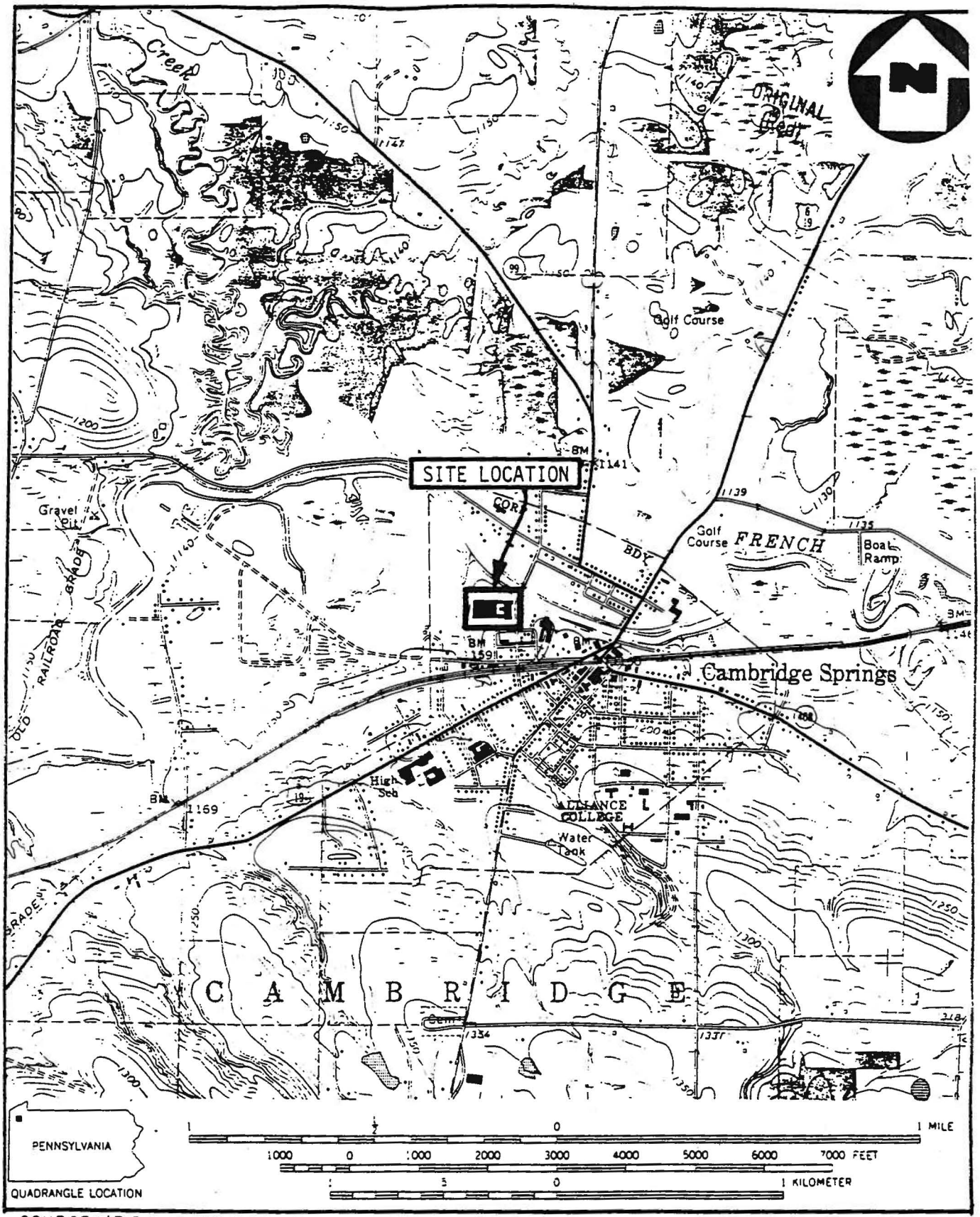
A public meeting will be held upon request. Requests for a public meeting should be made to Mr. Hon Lee of the EPA Regional Office at the address listed below or at 215-814-3419.

The Administrative Record contains all information considered by EPA when making this determination. The Administrative Record is available for review during business hours at the following location:

U.S. Environmental Protection Agency Region III (3WC22)
1650 Arch Street
Philadelphia, PA 19103
Contact: Hon Lee
Phone: 215-814-3419
Fax: 215-814-3113
E-mail:lee.hon@epa.gov

Following the thirty (30) day public comment period, EPA will prepare a Final Decision and Response to Comments in which it will identify the selected remedy for the Facility. The Response to Comments will address all significant written comments and any significant oral comments generated at a public meeting, if such a meeting is held. The Final Decision and Response to Comments will be made available to the public. If, on the basis of such comments or other relevant information, significant changes are proposed to be made to the remedy for the Facility as proposed by EPA in this Statement of Basis, EPA will seek additional public comments on any proposed revised remedy.

Attachment 1



SOURCE: (7.5 MINUTE SERIES) U.S.G.S. CAMBRIDGE SPRINGS, PA., QUAD

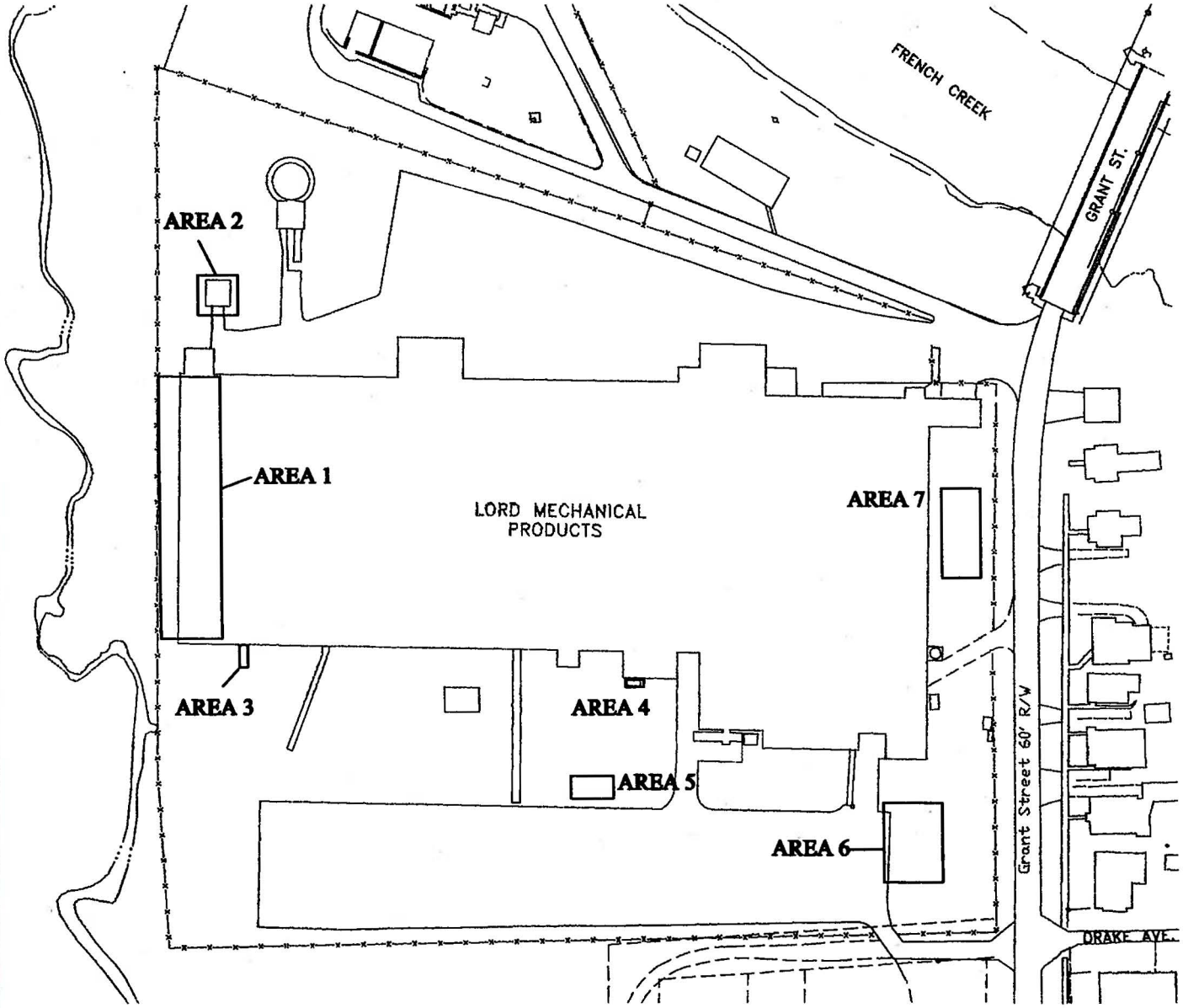
FIGURE 1

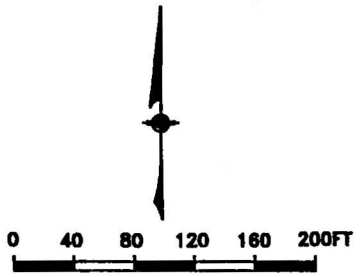
SITE LOCATION MAP
LORD INDUSTRIAL PRODUCTS DIVISION

SCALE 1: 24000

NUS CORPORATION

Attachment 2





LEGEND

FENCE

WATER

AREA 1 – WEST END DRUM STORAGE AREA
AREA 2 – EXTERIOR OF OIL/WATER SEPARATOR BUILDING
AREA 3 – COMPRESSOR BLOWDOWN AREA
AREA 4 – PERIMETER OF THE METHYLENE CHLORIDE TANK PAD
AREA 5 – FORMER LOCATION OF THE SOLVENT OVERSPILL TANKS
AREA 6 – FORMER LOCATION OF THE FUEL OIL STORAGE TANK
AREA 7 – FORMER LOCATION OF THE IRON–PHOSPHATE CLEANING LINE OVERSPILL TANKS

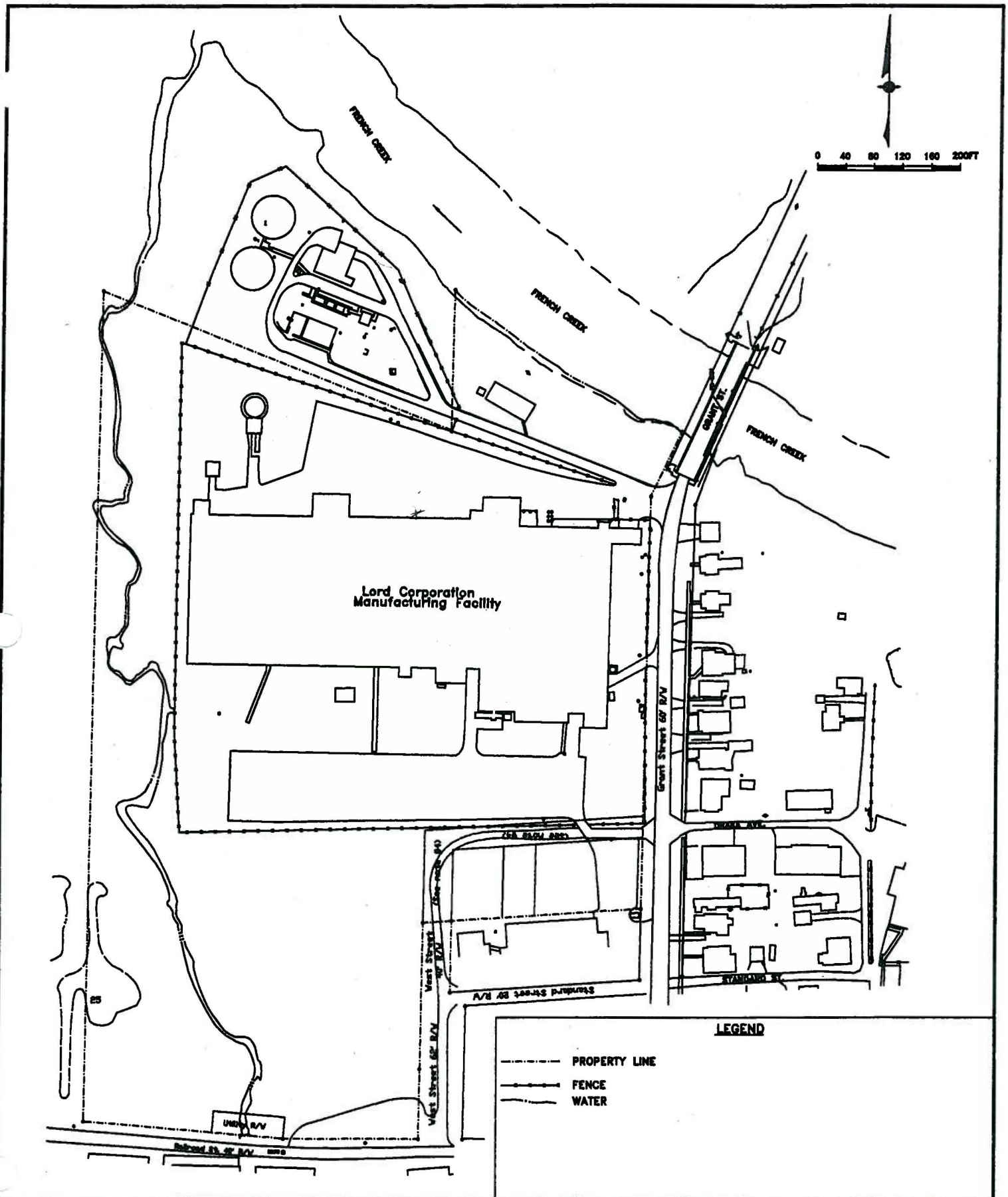
SWMUs – SOLID WASTE MANAGEMENT UNITS

AOCs – AREAS OF POTENTIAL CONCERN

ARCADIS GERAGHTY & MILLER

**SWMUs AND AOCs LOCATION MAP,
INITIAL CHARACTERIZATION INVESTIGATION
LORD MECHANICAL PRODUCTS DIVISION,
CAMBRIDGE SPRINGS, PENNSYLVANIA**

DATE	PROJECT MANAGER	DRAWING NAME
14JUL98	D. BALCER	BASE211
DRAWN	LEAD DESIGN PROF.	CHECKED
R. SMITH		D. BALCER
PROJECT NUMBER		DRAWING NUMBER
OH000498.0002.0001		3–1



ARCADIS GERAGHTY & MILLER

4700 Lakehurst Court
Suite 100, Dublin, OH 43016
Tel: 614/764-2250 Fax: 614/764-1270

FACILITY PLAN, LORD MECHANICAL PRODUCTS DIVISION CAMBRIDGE SPRINGS, PENNSYLVANIA

DATE	PROJECT MANAGER	DRAWING NAME
01APR98	D. BALCER	LORDCORP\CAMBSPRG
DRAWN	LEAD DESIGN PROF.	CHECKED
R. SMITH		D. BALCER
PROJECT NUMBER		DRAWING NUMBER
0H000498.0002.0001		1-1

Table 1

ARCADIS

Table 1. Historical Groundwater Elevation Data, Lord Corporation, Cambridge Springs, Pennsylvania.

	5/28/03	4/23/04	6/25/04	8/27/04	10/28/04	4/22/05	6/22/05	8/29/05	10/24/05	4/24/06	6/26/06	8/28/06	10/30/06
PZ-1	1129.45	1130.10	1129.34	1129.11	1129.47	1129.89	1129.21	1128.92	1129.01	1129.78	1129.09	1129.15	1133.38
PZ-2	1130.00	1130.54	1129.97	1129.70	1130.00	1130.51	1129.86	1129.62	1129.66	1131.19	1129.74	1129.70	1133.59
PZ-3	1129.30	1130.90	1129.22	1128.97	1129.28	NM(1)	1129.08	1128.76	1128.84	1129.43	1128.94	1128.87	NM(2)
PZ-4	1129.88	1130.45	1129.88	1129.60	1129.90	NM(1)	1129.79	1129.48	1129.52	1130.09	1129.62	1129.59	1133.53
PZ-5	1129.22	1129.82	1129.18	1128.94	1129.22	1129.63	1129.01	1128.69	1128.78	1129.35	1128.87	1128.76	1133.20
PZ-6	1129.37	1129.91	1129.49	1129.21	1129.43	1130.55	1129.33	1129.10	1129.16	1129.61	1129.24	1129.27	1132.13
MW-2D	1130.64	1131.21	1130.56	1130.32	1130.68	1131.10	1130.45	1130.26	1129.23	1130.83	1130.35	1130.32	1133.72

Note:
Elevation data collected from 5/28/03 was baseline data collected at the time the trees were planted.
NM(1): Elevation data could not be collected due to ongoing City of Cambridge Springs storm sewer work
NM(2): Elevation data could not be collected due to well being submerged under water.